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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No. 17-CR-124-ABJ
)
GIBSON CONDIE,)
)
Defendant.)

**DEFENDANT'S UNOPPOSED MOTION TO AMEND TERMS OF DEFENDANT'S
BOND AND CONDITIONS OF RELEASE**

Defendant, Gibson Condie, by and through his attorneys, Stephen H. Kline and William B. Pilger, respectfully moves the Court to amend the terms of his release to allow travel to the states of Idaho, Montana and Utah, prior to his sentencing hearing on January 8, 2018. Counsel for the Defendant has conferred with counsel for the United States as well as Defendant's Probation and Parole Officer, and they have indicated that they do not object to the Motion. In support thereof, Defendant states as follows:

From the time of his Initial Appearance in this case, Defendant has been allowed to travel to the State of Montana for work, although the work he was originally doing in Montana has ended. Defendant has also been allowed to travel to the State of Utah in the past to visit his elderly parents and for a family reunion. Defendant has a present employment opportunity to

haul farm equipment, hay and livestock for a Wyoming company during the holiday season. While the company has knowledge of Defendant's current situation and is nonetheless willing to hire him, the potential employment requires that he accept runs into the States of Montana and Idaho as well as in Wyoming. In addition, during the holiday season, Defendant again may wish to visit his family in Utah. Since the Indictment in this case, Defendant has strictly complied with the terms and conditions of his release and has not failed to appear for any hearing or setting in this case.

WHEREFORE, Defendant, Gibson Condie, by and through Counsel, respectfully moves the Court to amend the terms of his release to allow travel to the states of Idaho, Montana and Utah, prior to his sentencing hearing on January 8, 2018.

DATED this 5th day of December, 2017.



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CERTIFICATE OF SERVICE

I certify the foregoing pleading was served on this 5th day of December, 2017, and that copies were served as follows:

Eric J. Heimann
U.S. Attorney's Office
P.O. Box 668
Cheyenne, WY 82003-0668

[] ECF/CM
[] E-Mail
[] Overnight Delivery
[] U.S. Mail



Libby B Bushell